



1 **SAO**

2 BRYAN A. BOYACK, ESQ.

3 Nevada Bar No. 9980

4 **BOYACK LAW GROUP**

5 8906 Spanish Ridge Avenue, Suite 100

6 Las Vegas, Nevada 89148

7 Phone: (702) 744-7474

8 Fax: (702) 623-4746

9 Email: Bryan@BoyackLawGroup.com

10 *Attorneys for Plaintiffs*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 ROBERT G. PLEASANT, ALVARO CARRILLO,  
14 AND ROBERTO SOLIS,

15 Plaintiff,

16 v.

17 STATE FARM FIRE AND CASUALTY  
18 COMPANY, a Corporation; DOES I through X and  
19 ROE CORPORATIONS I through X, inclusive,

20 Defendants.

2:16-CV-01977-JAD-PAL

21 **PLAINTIFFS' STIPULATION AND**  
22 **ORDER TO EXTEND DISCOVERY**  
23 **DEADLINES**  
24 **(Third Request)**

25 **\*SUBMITTED IN COMPLIANCE**  
26 **WITH LR 26-1(e)\***

27 Pursuant to Local Rules 6-1 and 26-4, the parties, by and through their respective counsel  
28 of record, hereby stipulate to and request that the Court extend the deadlines by ninety days.

**A. STATEMENT SPECIFYING SPECIFIC THE DISCOVERY COMPLETED:**

The following discovery has been completed by the parties:

1. Defendant's Initial Disclosure, pursuant to FRCP 26(f);
2. Plaintiff's Initial Disclosure, pursuant to FRCP 26(f);
3. Deposition of Plaintiff Robert Pleasant;
4. Deposition of Plaintiff Alvaro Carrillo;
5. Defendant's Initial Expert Disclosures;

**B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:**

1. Deposition of Plaintiff Roberto Solis;
2. Deposition of both Plaintiff and Defendant's Experts;
3. Rebuttal Expert Disclosures.

**C. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITH THE TIME LIMITS SET BY THE DISCOVERY ORDER:**

Due to the nature this action, prior Plaintiff Counsel became a key witness. Plaintiff recently filed a Motion to Substitute Counsel, naming Bryan Boyack, Esq. of the BOYACK LAW GROUP as current counsel.

The deposition of Plaintiff Roberto Solis has yet to be conducted. Plaintiff has yet to take party depositions as the party representatives are adjusters with whom Plaintiffs' Counsel had personal correspondence prior to litigation, which correspondence is the subject of this action. Defendants have also disclosed several initial experts, and Plaintiffs require additional time to obtain rebuttal experts and respond to Defendants' experts' opinions.

The parties believe that a modest addition of ninety days will accommodate both parties sufficiently to conclude the discovery that remains in this matter.

**D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

|                      | <b>Old Deadline</b> | <b>New Deadline</b> |
|----------------------|---------------------|---------------------|
| Discovery Cut Off:   | 01/16/2018          | 04/16/2018          |
| Expert Disclosure:   | 11/16/2017          | 02/14/2018          |
| Rebuttal of Experts: | 12/17/2017          | 03/19/2018          |
| Dispositive Motions: | 02/15/2018          | 05/16/2018          |



1                   **A.     SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDUE**  
2                   **DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.**  
3

4                   Dated: December 14, 2017  
5                   **BOYACK LAW GROUP**  
6

                    Dated: December 14, 2017  
                    **RANALLI ZANIEL FOWLER & MORAN**

7                   /s/ Bryan A. Boyack  
8                   BRYAN A. BOYACK, ESQ.  
9                   Nevada Bar No. 9980  
10                  8906 Spanish Ridge Avenue, Suite 100  
11                  Las Vegas, NV 89148  
                    *Attorney for Plaintiffs*

/s/ Benjamin Carman  
                    GEORGE M. RANALLI, ESQ.  
                    Nevada Bar No. 5748  
                    2400 W. Horizon Ridge Parkway  
                    Henderson, NV 89052  
                    *Attorney for Defendants*

12                   **ORDER**

13                   IT IS SO ORDERED

14                   Dated: December 15, 2017  
15

*Jerry A. Green*  
                    UNITED STATES DISTRICT COURT  
                    MAGISTRATE JUDGE

